

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-cv-21097-MOORE/ELFENBEIN

REPUBLIC OF PANAMA,)
Petitioner,)
v.)
OMEGA ENGINEERING LLC and)
OSCAR RIVERA,)
Respondents.)

)

**PETITIONER'S CONSENT MOTION FOR EXTENSION OF TIME TO FILE REPLIES
TO (1) RESPONDENTS' SUPPLEMENTAL RESPONSE IN OPPOSITION TO
PETITIONER'S CONVERTED MOTION FOR SUMMARY JUDGMENT
AND (2) RESPONDENTS' STATEMENT OF MATERIAL FACTS**

Petitioner, the Republic of Panama ("Panama" or "Petitioner"), respectfully requests the Court to extend the time by which Panama may file its Replies to Respondents, Omega Engineering LLC ("Omega") and Oscar Rivera's ("Rivera," and with Omega, collectively, "Respondents") (1) Opposition to Petitioner's Converted Motion for Summary Judgment (ECF No. 115) and (2) Respondents' Statement of Material Facts (ECF No. 115-1), to May 1, 2025. Because there is good cause for the requested relief, which has been agreed to by Respondents, the Court should grant this motion in further support of which Panama states the following:

1. On October 11, 2024, Panama filed a Renewed Motion for Judgment on Petition to Recognize and Enforce ICSID Award ("Renewed Motion for Judgment"). ECF No. 66.

2. Pursuant to Federal Rules of Civil Procedure 12(d) and 56, this Court converted Panama's Renewed Motion for Judgment to a Motion for Summary Judgment on March 20, 2025 ("Order"). ECF No. 109.

3. The Order provided the parties with ten (10) days to supplement the record, following which Respondents had fourteen (14) days to respond to Panama's Converted Motion for Summary Judgment, and Panama was granted seven (7) days to reply to Respondents' response.

4. Pursuant to the Court's Order, Panama filed its Statement of Material Undisputed Facts in Support of its Converted Motion for Summary Judgment on March 31, 2025. ECF No. 111.

5. Respondents in turn filed an Opposition to Panama's Converted Motion for Summary Judgment and their own Statement of Material Facts on April 14, 2025. ECF Nos. 115, 115-1.

6. Panama's replies to both (1) Respondents' Opposition to Panama's Converted Motion for Summary Judgment and (2) Statement of Material Facts is due on April 21, 2025.

7. Due to Petitioner's conflicting obligations, the upcoming Easter holiday which Panama recognizes as a public holiday beginning on Thursday, April 17, 2025 through Sunday, April 20, 2025, and the need for counsel for Panama to consult with its client in connection with this matter, Panama respectfully requests a reasonable ten (10) day extension of time, until May 1, 2025 to respond to (1) Respondents' Opposition to Panama's Converted Motion for Summary Judgment and (2) Statement of Material Facts.

8. Respondents have graciously agreed to Panama's request for an extension of time.

9. The requested extension of time is made in good faith, not for the purpose of delay, and will not prejudice the Court or any party.

For the foregoing reasons, Panama respectfully requests the Court enter an Order granting the consent motion for extension of time, allowing Panama until May 1, 2025 to file its Replies to (1) Respondents' Opposition to Panama's Converted Motion for Summary Judgment and (2) Respondents' Statement of Material Facts. For the Court's convenience, a proposed Order granting this motion is attached as **Exhibit A**.

LOCAL RULE 7.1 CERTIFICATE OF CONFERRAL

I HEREBY CERTIFY that, pursuant to S.D. Fla. L.R. 7.1(a)(2), the undersigned counsel has conferred with counsel for Respondents, who represented that they consent to the relief of an enlargement of time requested herein.

Dated: April 16, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 16, 2025, the foregoing was filed with the Clerk of Court using CM/ECF, which will serve a Notice of Electronic Filing on all counsel of record.

By: /s/ Hans H. Hertell
Hans H. Hertell